Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)
	)
Review of Part 15 and other Parts	) ET Docket No. 01-278
of the Commission's Rules	) RM-9375
	) RM-10051

November 12, 2001

To: The Commission

COMMENTS OF DR. JEFFREY P. LA COSSE
IN RESPONSE TO NOTICE OF PROPOSED RULE MAKING

It is clear that the emissions from the SAVI devices will inevitably cause interference to Amateur stations from unpredictable locations, transmitting at 110,000 uV/m at a high duty cycle immediately adjacent to the 432 MHz weak-signal band, in a band used extensively by Amateurs for control links for repeaters and other functions.

Even if this high-power system is to be allowed to operate with high duty cycles (possibly greater than 90 percent, instead of 1 part in 30 that is currently allowed) there is no reason whatsoever why 433 MHz should have been chosen for this application, and it should not be allowed between 420 and 450 MHz. The high duty cycle is completely contrary to the basic reason for allowing such high power for periodic radiator devices in FCC Rules Section 15.231(e).

SAVI appears to be lazy to ask the FCC to make a change to Part 15 instead of making a simple design change in their device that would allow transmissions in a frequency region outside U.S. Amateur Radio allocations yet still can be used in Europe on transcontinental shipments. At the very simplest level, they could make the device operate at another frequency that would not create a problem in either the U.S. and Europe.

Why did they not instead petition the European Union body that governs communications for a change that would benefit the U.S. and its amateur radio operators? That is surprising especially for a company that is based in the United States and Asia.

As displayed recently in New York City, VHF and UHF amateur communications has played a vital role in disaster relief efforts. As a free service to the public, amateur radio allocations should be held in the highest regard and should not be infringed upon by commercial interests. Many areas rely solely on amateur communications for disaster relief, and allowing these devices in question to operate in the frequency band can potentially disrupt vital emergency communications when they are needed the most. During the aftermath of Hurricane Fran in 1996 (and Hurricane Floyd in 1999), North Carolina amateurs were found to be the ONLY

source of communications for a critical time period when cell phones, landline phones and other emergency communications were disabled.

While commercial interests can afford to make design changes to their equipment (especially if they manufacture the equipment) to avoid interference with amateur radio, it is not true for amateurs. Most amateurs invest a large fraction of their disposable income on their equipment, and cannot afford to withstand interference from devices that could have easily been redesigned to prevent it.

PLEASE PROTECT AMATEUR RADIO FREQUENCY ALLOCATIONS FROM INTERFERENCE OF THESE DEVICES!!

I have been a licensed amateur radio operator since 1977. For the first 20 years of my participation in amateur radio, I had primarily operated on the HF bands. Over the last 4 years, however, I have broadened my interest into VHF and UHF and have spent considerable time learning to design and build my own antennas for all bands I currently operate on. I am thankful that we have frequencies available to not only provide emergency communications, but to provide a medium for young people to learn skills that are not taught in our public schools.

Sincerely,

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